

Heliene Inc.

Modern Slavery Statement

2024

ABOUT OUR COMPANY

Heliene Inc (“Heliene”), is located in 488 Allen’s side Rd, Sault Ste. Marie, ON, a Canadian held private company founded in 2009 in Sault Ste Marie, Ontario which ambitiously targeted to be a leader in solar module manufacturing by providing a superior quality product and exceptional customer experience that would separate us from many of our competitors. Since starting our initial module manufacturing line in Sault Ste Marie in 2010 with an annual capacity of 35MW of Canadian made solar modules, Heliene has since expanded through organic growth to 1.0GW of module production in North America. This growth comes with the latest expansion in the State of Minnesota servicing the US market with domestic production of state-of-the-art solar modules of world class quality. In response to the demand, Heliene has certified its own OEM business partners worldwide under the Heliene name. Heliene has grown to service many jurisdictions and has now become a bankable module of choice for customers and is on a short list of Tier 1 module manufacturers worldwide. Heliene continues to expand to service various markets in the North American photovoltaic supply chain. Heliene has personnel and locations stationed across North America including Sault Ste Marie, Toronto, Mountain Iron, Minneapolis, Rogers, California, Wisconsin, and many others. Heliene has leveraged the expertise of people across the globe for engineering, technological development and provides employment opportunities to experts in all fields including Finance, Supply Chain, Logistics, Engineering, Technology, Manufacturing, Project Management, Electrical and Mechanical disciplines as well as many operational roles. Heliene understands that modern slavery can take many forms but fundamentally is a range of exploitive practices including human trafficking, forced labour, servitude, deceptive recruiting, and child labour.

Heliene does not tolerate modern slavery, forced labor nor human trafficking whatsoever. Heliene is committed to high ethical standards in all aspects of its business, and endeavors to work with suppliers that follow these same high standards.

Heliene is also committed to mitigating the risk of modern slavery occurring within its own business, in its supply chains and through other business relationships. Heliene will not knowingly engage with any consultants, suppliers or contractors that engage in modern slavery.

OUR COMMITMENT

Heliene is committed to having a robust framework and processes in place to minimise the risk of modern slavery in our business operations and our supply chains.

Heliene is also committed to prevent, remove, and resolve any act of modern slavery within its own network and ultimately throughout the industry as a whole. From engaging with those suppliers who practice high standards of business ethics to improving transparency and traceability of its supply chain, Heliene is striving to become a leading example in protecting labour rights. As part of this responsibility, Heliene is committed to improving its understanding and mitigation of the risks of modern slavery occurring within our operations and supply chain. Heliene has progressed a number of initiatives to meet these objectives.

Heliene as part of the global operations firmly opposing the use of forced labour within the solar supply chain. As stated in the pledge, Heliene “is committed to helping ensure that the solar supply chain is free of forced labor and raising awareness within the industry on this important issue. To assist in these efforts, Heliene supports the development of an industry-led solar supply chain traceability protocol as a tool for identifying the source of primary raw materials and inputs and tracking their incorporation into finished products, including solar modules.”

Heliene will continue to advance our processes, apply our rigorous modern slavery risk management methodology and delve more deeply into the practices of our high-risk suppliers and our operating locations.

This is Heliene’s second modern slavery statement under Fighting Against Forced Labor and Child Labor in Supply Chains Act and to amend the Customs Tariff (the Act or Canadian Modern Slavery Act) and this statement sets out the actions Heliene has taken to assess and address modern slavery risks in our operations and supply chains. Heliene has made material progress in implementing and developing the risk management framework to identify the modern slavery risks and measure the effectiveness of its key mechanisms to mitigate and eliminate the modern slavery in its overall business operations and supply chains.

OPERATIONS AND SUPPLY CHAINS

Heliene is one of the world’s largest in North America and most recognised photovoltaic manufacturers for its high-quality, high-efficiency solar modules. Heliene’s main business function in Canada and USA is to manufacture and distribute photovoltaic (“PV”) modules.

Heliene is headquartered in Sault Siant Marie in Canada and its manufacturing chain consists of one module production sites in Canada and USA.

Heliene’s business division that serves as a complete energy solutions provider specialising in solar module technology, energy storage and solar project development, is committed to conducting business in the most ethical and transparent manner possible.

Heliene has an established Code of Conduct, and also provides this statement to further inform the customers about its position on this important topic. The Code and policies, such as Ethical Business Practices, set out clear expectations with respect to human rights. These policies are supported by documented processes for the management of complaints and grievances, and Heliene has an independent whistle-blower service should employees wish to report policy breaches confidentially.

These policies and procedures are reviewed regularly, and material breaches of policy are reported to the relevant group Board for the business. Heliene is reliant on a global and complex solar supply chain. Over the years, Heliene has established a flexible and adaptable supply chain to consolidate securing of raw materials and components. Further, Heliene has implemented strict guidelines in evaluating current and

potential suppliers that gauges each vendor’s competence across all attributes, including its socially responsible nature. The processes and practices that Heliene applies with respect to managing modern slavery risks in Heliene’s workforce form part of its overarching risk management program and are subject to the oversight of Heliene.

MODERN SLAVERY RISKS

Heliene is committed to identifying any possible modern slavery risks in its business operations and supply chains. Heliene acknowledges that it will address any modern slavery instances when they occur; and seek to prevent or mitigate any modern slavery instances that are linked (directly or indirectly) to its business operations even where it has not contributed to these any modern slavery instances itself.

Heliene acknowledges that in the industry sector and the supply chains we operate in, certain aspects of our business operations and supply chains may have a higher risk of modern slavery. Heliene has considered the following factors in evaluating the risk of modern slavery in its operations and supply chains:

Risk Indicator	Description
Industry risks	As an organisation that operates in the manufacturing industry, Heliene understands that we are identified as a high-risk industry
Product and service risks	Heliene further understands that certain products used in our supply chains are identified as high-risk products
Entity risks	Heliene is not aware of any non-compliance with human rights or labour standards

ACTIONS TO BE TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

Heliene is focused on building its understanding and capabilities, improving its policies and processes, and enhancing engagement with its suppliers / OEM partners. Heliene is committed to take the following actions during the next reporting period in order to assess and address modern slavery risks with its operations and supply chains.

Workstream	Actions to be taken to assess and address modern slavery risks
Accountability for modern slavery issues, with an identified risk owner	Heliene acknowledges that we are accountable for addressing modern slavery issues in our business operations and supplier contracts. A nominated resource will be responsible for co-ordinating management of this risk.
On-boarding and contracting	Heliene will continue to perform due diligence on all new suppliers to determine their risk level and control procedures in relation to ethical sourcing and modern slavery as appropriate for our business.
Training	Heliene will ensure that all employees receive adequate training on its Modern Slavery Statement and its Modern Slavery Policy and any supporting processes applicable to their role.

Complaints mechanism	Heliene is committed to encouraging our employees to report suspected violations involving any form of forced labour and modern slavery through our Global Ethics Hotline. Our global grievance channel will provide our employees to report any forms of modern slavery risks identified in our operations or supply chains.
----------------------	---

Heliene recognises that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that Heliene is committed to continue to build upon.

MEASURING EFFECTIVENESS

Heliene’s risk management framework aligns with the global risk management system. Heliene has established its companywide risk management strategy and built and operated a system with which it may not only prevent a risk in advance but also cope with it as soon as it happens through a comprehensive analysis and counterplan.

Heliene continues to evaluate and perform the following internal control systems and mechanisms to identify, assess and monitor emerging the modern slavery risks within our business partners and supply chains and eliminate these risks.

Internal Control System	Controls or action effectiveness
SUPPLIER AUDITS	Heliene has conducted supplier audits both on a global and local scale for those vendors that provide critical resources such as raw materials. A Qualification Audit is conducted at the initial approval stage prior to the supplier’s first transaction with Heliene. In addition, Heliene also hold frequently scheduled Surveillance Audits by third party like STS, CEA for approved vendors in addition to demand audits to find root cause of or verify corrective actions from customer claims and quality issues. These audits are based on extensive questionnaire of wide-ranging criteria which evaluates each supplier’s competency in the following areas: <ul style="list-style-type: none"> ▪ sourcing & purchasing ▪ manufacturing control ▪ warehouse management ▪ calibration ▪ traceability ▪ human rights & working standards ▪ ethical behaviour ▪ anti-corruption ▪ environmental protection ▪ health & safety.
SUPPLIER’S DUE DILIGENCE	Heliene endeavours to serve the customers with solar products that meet global social compliance standards in all aspects, throughout every node of its supply chain. While Heliene is examining various avenues to make certain that these values are upheld, our partners are constantly encouraged to comply with ethical principles. We share our Code of Conduct with all direct suppliers as well as our OEM makers via purchase orders. Our suppliers are required to sign and certify that they will abide by the Code of Conduct with contract termination on the line if they object to do so.
MANAGEMENT SYSTEM	Heliene has worked with the Suppliers to ensure they have a management system that is designed to ensure: <ul style="list-style-type: none"> ▪ compliance with applicable laws, regulations and customer requirements related to operations and products; and

	<ul style="list-style-type: none"> ▪ conformance with our Code of Conduct; and ▪ identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system contains corporate social and environmental responsibility policy statements affirming the commitment to compliance and continual improvement, endorsed by executive management.
TRACEABILITY COMPETENCE	<p>Heliene undertakes ongoing efforts to further enhance its supply chain transparency to ensure ethical component sourcing. From periodic self-evaluations to 3rd party audits, we are determined to fulfill its stakeholders’ demand to find a socially responsible, trustworthy entity in us. We implemented the Traceability Systems Maturity Assessment. We have been conducting self-assessments on a regular basis to inspect where the maturity of its traceability coordination reflects in comparison to that of the global standards. Additionally, Heliene has access to a risk management database (Kharon) through its legal firm, who monitor and assess the risk of forced labor across the entire supplier value chain.</p>

SUPPLIER CODE OF CONDCUT

Heliene is committed to conducting business in an ethical and honest manner, and in a way that promotes corporate social and environmental responsibility. This includes responsible supplier selection by conducting business with suppliers who share the Heliene’s commitment to integrity. Heliene understands that the business practices and actions of a supplier may impact or reflect upon the Heliene and its subsidiaries.

Therefore, Heliene operates, and require its suppliers, their employees, agents, and sub - suppliers (“Suppliers”) to operate in accordance with the principles and ethical standards contained in the Heliene Code of Conduct. Heliene has several potential OEM business partners, who have purchased modules for Canadian customers. Heliene takes a proactive approach to monitoring anti-slavery measures within its OEM business partnerships. Through rigorous supplier evaluation processes and ongoing communication, Heliene ensures that its partners adhere to strict ethical standards, including the prevention of forced and child labor. Regular audits, site visits, and compliance checks are conducted to verify compliance with anti-slavery regulations and to address any issues promptly. Additionally, Heliene provides training and support to its partners to raise awareness and promote best practices in combating modern slavery. By fostering transparency, accountability, and collaboration, Heliene strives to create a supply chain that is free from exploitation and upholds the dignity and rights of all workers involved.

The purpose of our Supplier Code of Conduct is to define the basic sustainability requirements stipulated for all our Suppliers and OEM business partners. Our Supplier Code of Conduct is divided into four sections:

- Human Rights
- Labour Standards
- Environment
- Business Principles

HUMAN RIGHTS

Heliene is fully committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community.

Heliene requires all business in its supply chain to share the commitment to respecting, protecting, and promoting human rights. At a minimum, the expectation is:

- Safe and hygienic working conditions
- No use of child labour
- Payment of a living wage
- No excessive working hours
- No discrimination (i.e. race, colour, gender, sexual orientation, marital status, parental, status, religion etc.)
- No harsh or inhumane treatment

LABOUR STANDARDS

Heliene's labour standards are as follows:

- Freely chosen employment
- Child labour avoidance and compliance with young worker safety
- Working hours
- Wages and benefits
- Humane treatment
- Non-discrimination

Involuntary, bonded (including debt bondage) or indentured labour or exploitative prison labour, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.

All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government issued identification, passports, or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.

Child labour is not to be used in any stage of manufacturing. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.

Workers under the age of 18 shall not perform work that is likely to jeopardise their health or safety. Heliene works with its Suppliers/ OEM partners to ensure proper management of student workers through protection of students' rights in accordance with applicable law and regulations.

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local laws and regulations.

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, works shall be provided with a timely and understandable wage statement that includes sufficient information to verify its accuracy in compensation for the work performed. All use of temporary, dispatch and outsourced labour will be within the limits of the local law.

Heliene works with its Suppliers / OEM partners to ensure disciplinary policies and procedures shall be clearly defined and communicated to workers. There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment. Disciplinary policies and procedures shall be clearly defined, documented, and communicated to workers.

We are committed to a workforce free of harassment and unlawful discrimination. Heliene works with its Suppliers to ensure that no person will engage in discrimination based on race, colour, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

HEALTH AND SAFETY

Heliene recognises that in addition to minimising the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. We also recognise that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

These health and safety standards are as follows:

- Occupational safety
- Emergency preparedness
- Occupational Injury and illness
- Industrial hygiene
- Machine safeguarding
- Sanitation, food, and housing
- Health and safety communication

Worker exposure to potential safety hazards (e.g., electrical, and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well maintained, personal protective equipment. Workers be encouraged to raise safety concerns and shall not be disciplined for raising safety concerns.

Emergency situations and events are to be identified and assessed, and their impact minimised by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation, procedures, worker training and drills, appropriate fire detection and

suppression equipment, adequate exit facilities, and recovery plans. Such plans shall include the focus of minimising harm to life, the environment and property.

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to:

- Encourage worker reporting
- Classify and record injury and illness cases
- Provide necessary medical treatment
- Investigate cases and implement corrective actions to eliminate their causes
- Facilitate return of workers to work.

Worker exposure to chemical, biological, and physical agents at dangerous levels is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

Production and other machinery should be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Heliene works with its Suppliers / OEM partners to ensure workers are provided with the appropriate workplace health and safety training in their language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards.

Health and safety information shall be clearly posted in the work facility or placed in a location identifiable and accessible by workers, in accordance with applicable law. Workers shall be encouraged to raise safety concerns and not fear or experience any retaliation or reprisal for so doing.

ENVIRONMENT

Heliene recognises that environmental responsibility is integral to producing world class products through the following:

- Protecting the environment
- Environmental permits and reporting
- Pollution prevention and resource reduction
- Manage and minimise fuel and energy usage

Heliene recognises the value of the natural environment and strives to ensure the sustainability of the environment in decisions about investment, procurement, and operations. Heliene's suppliers must comply with environment laws and regulations and must continue to improve environmental sources to preserve the water/climate atmosphere/soil environment.

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

Emissions and discharges of pollutants and generation of waste are to be minimised or eliminated at the source to the extent feasible by practices such as adding pollution control equipment, modifying production, maintenance, and facility processes, or by other means. The use of natural resources including water, fossil fuels, minerals, and virgin forest products is to be conserved or minimised to the extent feasible by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or by other means.

Chemical and other materials posing a hazard if released to the environment are to be identified and managed in accordance with applicable law to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Heliene and its Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

Heliene will continue to maintain a water management program that documents, characterises, and monitors water sources, use and discharge, seeks opportunities to conserve water, and controls channels of contamination, all in accordance with applicable law. All wastewater is to be characterised, monitored, controlled, and treated as required prior to discharge or disposal.

Heliene works with our Suppliers to conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

Ethics

To meet social responsibilities and to achieve success in the marketplace, Heliene works with its Suppliers / OEM partners to uphold the highest standards of ethics including the principles outlined below.

- Business integrity
- No improper advantage
- Disclosure of information
- Intellectual property
- Fair business, advertising, and competition
- Protection of Identity and non-retaliation
- Responsible sourcing of minerals
- Privacy

The highest standards of integrity are to be expected in all business interactions. Heliene has a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement. All business dealings should be transparently performed and accurately reflected in our records. Monitoring and enforcement procedures shall be implemented to ensure conformance with anticorruption laws.

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorised, given, or accepted. This prohibition covers promising, offering, authorising, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Information regarding labour, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

Standards of fair business, advertising and competition are to be upheld.

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Heliene should have a communicated process for their personnel and workers to be able to raise any concerns without fear of retaliation or reprisal.

Heliene is committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees.

Heliene works with its Suppliers / OEM partners to comply with all applicable laws and regulations in all locations where suppliers conduct business.

In addition to complying with all applicable laws and regulatory requirements, suppliers are expected to act in accordance with high standard of business ethics.

Suppliers agree to safeguard the confidentiality of confidential information concerning our business partners and customers, to issue accurate and relevant financial and other information on our business operations, and to compete fairly and ethically in all other aspects.

The highest standards of integrity are expected from our suppliers, including their subcontractor and other entities acting on behalf of the supplier in all business interactions. All forms of extortion, bribery, and corruption, including improper offers of payment to or from employees or organisations, are prohibited.

Heliene encourages its suppliers / OEM partners to establish and maintain policies and procedures designed to prevent bribery and corruption.

SIGNATURE OF RESPONSIBLE MEMEBR

This Modern Slavery Statement 2024
was approved and signed by
Martin Pochtaruk in his role
as the CEO of
Heliene Inc. on March 11th, 2025.

DocuSigned by:

073882F8110A4C8...

3/11/2025

Annexure A

Mandatory Reporting Criterion	Reference in this statement
Identify the reporting entity	Introduction Our Commitment
Describe the reporting entity's structure, operations, and supply chains	About Heliene Inc. Operations and Supply Chains
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Modern Slavery Risks
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes	Actions Taken to Assess and Address Modern Slavery Risks
Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	Measuring effectiveness
Describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement, the entity giving the statement	Consultation Approval
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Ethical Framework Supplier Code of Conduct